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May 25, 2022

**Via ECF**

The Honorable James B. Clark, III  
United States District Court  
Martin Luther King Jr. Federal Building and Courthouse  
50 Walnut Street, Room MLK 2A  
Newark, New Jersey 07102

**Re: Morales v. Healthcare Revenue Recovery Group, LLC**  
**Case No. 2:15-cv-08401-ES-JAD**

Dear Judge Clark:

I represent Defendant in this matter. On April 11, 2022, the Court entered an Order requiring HRRG to produce additional documents (ECF 157). Due to limited internal resources and complications associated with producing some of the additional account notes, Defendant respectfully requests a thirty (30) day extension of both the May 31, 2022 production deadline and the June 30, 2022 class certification deadline. \*

Counsel for Plaintiff consents to this request for an extension of deadlines. Thank you in advance for Your Honor's consideration.

**SO ORDERED**

**s/James B. Clark**

**James B. Clark, U.S.M.J.**

**Date:** 5/26/22

Respectfully submitted,

**MARKS, O'NEILL, O'BRIEN,  
DOHERTY & KELLY, P.C.**

**/s/ Jonathan R. Stuckel**

Christian M. Scheuerman, Esquire  
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cc: Yongmoon Kim, Esquire

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